

FILED
FEB 22 2008

CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
DIVISION

Jon Doss,
Plaintiff,

CIV 08-4024

vs.

COMPLAINT

Dept. of Corrections
Defendant.

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes No

B. If your answer to "A" is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county)

3. Docket number _____

4. Name of Judge to whom case was assigned _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit _____

7. Approximate date of disposition _____
(1)

II. PLACE OF PRESENT CONFINEMENT Mike Durfee State Prison

A. Is there a prisoner grievance procedure in this institution? Yes No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? Yes No

C. If your answer is yes,

1. What steps did you take? Informal Resolution, Administrative Remedy, Administrative Remedy Appeal

2. What was the result? _____

D. If your answer is no, explain why not _____

E. If there is no prison grievance procedure in the in the institution, did you complain to prison authorities? Yes No

F. If you answer is yes,

1. What steps did you take? Informal Resolution, Administrative

2. What was the result? _____

III. PARTIES

In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of Plaintiff Jon Doss
Address 1412 Wood Street, Springfield SD Signed and executed this

In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and places of employment of any additional defendants.

B. Name of Defendant Dr. Mark Steil who is employed as
Psychologist at Mike Durfee State Prison (2)

C. Additional Defendants Warden Dooley

IV. STATE OF CLAIM

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet(s) if necessary.

I was put on the medication Celexa by Dr. Mark Steil (date unknown) I have been diagnosed with Anxiety, depression and bi-polar, upon taking said medication, I started having terrible mood swings and thoughts of Jefaited suicide. After reasearch the med. Celexa, I found I should never have been prescribed it based on my diagnoses of bi-polar disorder

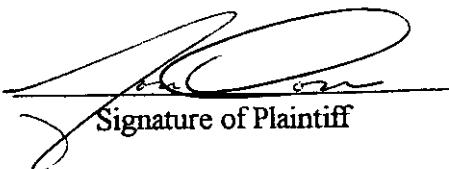
V. RELIEF

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like to be ~~properly~~ thoroughly examined by professional doctors, put on medication that suits my diagnosis and thoroughly compensated for the stress and emotional damages I have received under the medical malpractice of Dr. Mark Steil.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Signed and executed this 17th day of February, 2008. Plaintiff and executed on



Signature of Plaintiff

(9/96)

(3)

Overview

Celexa is the brand name for Citalopram, an SSRI — Selective Serotonin Reuptake Inhibitor. SSRIs work by raising or restoring serotonin levels and relieving depression. Celexa is a relatively new drug: introduced in the United States in 1998, though it has been used in Europe since 1989.

The effects of this medication can usually be seen in two to three weeks, though some patients may require four or more weeks to feel better.

Why is this drug prescribed?

Celexa is used to treat patients with major depressive disorder. It is not for use in patients with bipolar (manic depressive) disorder as it can exacerbate mania or cause a rapid swing from the depressive to the manic phase.

Celexa is also used to treat obsessive-compulsive disorder (OCD), though it is not FDA approved for this diagnosis.

Warnings and Precautions

Celexa is not addictive, but abrupt discontinuation may cause withdrawal. Doses should be tapered off when Celexa therapy is discontinued.

Celexa can cause drowsiness or trouble thinking in some people. Patients should not drive or operate heavy machinery until they know that Celexa does not affect their ability to safely engage in these activities.

Studies on this medication have only been conducted on adults, and the effects of Celexa in children below the age of 18 have not been established.

For Nursing Mothers: Studies indicate that Celexa can increase the risk of birth defects when taken by pregnant women; the doses used in these studies were higher than normal therapy doses. Celexa is excreted in breast milk, and it may cause excessive sleepiness and/or weight loss in a nursing infant; it is not recommended that women breastfeed while taking Celexa.

Contraindications

Celexa should Not be used for people with the following medical conditions:

1. kidney or liver disease — dosage may need to be lowered
2. seizures or a history of seizures
3. mania or a history of mania

Adverse Reactions

Celexa may cause the following reactions:

1. nausea
2. dry mouth
3. sleepiness
4. increased sweating
5. low blood pressure
6. minor weight loss
7. increased appetite
8. diarrhea
9. impaired concentration
10. high blood pressure
11. hot flashes
12. dry eyes
13. arthritis
14. muscle weakness
15. low concentration of sodium in blood

16. sexual difficulties (decreased libido, ejaculation disorder, and impotence)
17. serotonin syndrome (see Interactions with Drugs and Other Substances)

Interactions with Drugs and Other Substances

Drugs or substances that may interact with Celexa are:

1. MAO Inhibitors (within 14 days) - serious, even life-threatening, interactions that can occur
2. imipramine/ desipramine — Celexa may inhibit the metabolism of this drug
3. alcohol
4. grapefruit juice
5. Bromocriptine (Parlodel), Buspirone (BuSpar) certain tricyclic antidepressants (amitriptyline [Elavil], clomipramine [Anafranil], imipramine [Tofranil]), Dextromethorphan (cough medicine), Levodopa (Sinemet), Lithium (Eskalith), Meperidine (Demerol), Moclobemide (Manerex), Nefazodone (Serzone), Pentazocine (Talwin), other SSRIs (fluoxetine [Prozac], fluvoxamine [Luvox], paroxetine [Paxil], sertraline [Zoloft]), LSD, MDMA (ecstasy), marijuana, Sumatriptan (Imitrex), Tramadol (Ultram), Trazodone (Desyrel), Tryptophan, Venlafaxine (Effexor) - Taking these medicines with Celexa can increase the chance of developing a very rare, but very serious, unwanted effect known as the serotonin syndrome. Symptoms of serotonin syndrome include confusion, diarrhea, fever, poor coordination, restlessness, shivering, sweating, talking or acting with excitement you cannot control, trembling or shaking, or twitching.

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